

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WADE K. MARLER, DDS, individually and on behalf of all others similarly situated,

Plaintiff,

V.

**ASPEN AMERICAN INSURANCE
COMPANY,**

Defendant.

No. 2:20-cv-00616-BJR

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO MOTION TO
CONSOLIDATE

STIPULATION

This stipulation extends the briefing schedule for Plaintiff's Motion to Consolidate (Sept. 25, 2020, Dkt. # 20) which was filed in this and 25 other actions, in light of the Court's First Scheduling Order (Sept. 29, 2020, Dkt. # 23), which was entered in this and 33 other actions.

WHEREAS,

1. Plaintiff initiated this action on April 22, 2020.
 2. Defendant appeared in this action on September 9, 2020.
 3. Plaintiff filed its Motion to Consolidate on September 25, 2020, Dkt. # 20, in this
and 25 other proposed class actions pending before this Court.

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND
TO MOTION TO CONSOLIDATE**
(2:20-cv-00616-BIR) - 1

KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
TELEPHONE: (206) 623-1900
FACSIMILE: (206) 623-3384

1 4. Absent agreement to the contrary, Defendants' response(s) to Plaintiffs' Motion
2 to Consolidate is due October 16, 2020.

3 5. The Court issued its First Scheduling Order on September 29, 2020, Dkt. # 23, in
4 this action and 33 other actions pending before this Court. The Court's Scheduling Order calls
5 for the parties in all actions to meet and confer on topics identified in the Order, including issues
6 related to case management and administration of the actions, and to participate in a forthcoming
7 case management conference.

8 6. All parties have agreed to meet and confer regarding the Court's Scheduling
9 Order on October 14, 2020 at 11:00 am PDT.

10 7. Because this meet and confer may impact positions taken by the parties related to
11 Plaintiff's Motion to Consolidate, the parties hereby agree and stipulate that a short extension of
12 the briefing deadlines is warranted.

13 8. This stipulation will not cause any party prejudice or undue delay, and this
14 stipulation is designed to facilitate orderly case management.

15 NOW, THEREFORE, in the interest of efficiency and to allow the meet and confer
16 process to proceed, the parties agree and stipulate as follows:

17 1. The deadline for Defendants in each of the 26 class actions in which Plaintiffs'
18 Motion to Consolidate was filed to respond to the Motion to Consolidate is extended to October
19 21, 2020.

20 2. Plaintiffs' reply in support of its Motion to Consolidate will be due 14 days after
21 Defendants file their responsive brief(s).

ORDER

IT IS SO ORDERED.

DATED this 15th day of October, 2020.

**Barbara J. Rothstein
UNITED STATES DISTRICT JUDGE**

**Barbara J. Rothstein
UNITED STATES DISTRICT JUDGE**

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND
TO MOTION TO CONSOLIDATE**
(2:20-cv-00616-BJR) - 3

KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
TELEPHONE: (206) 623-1900
FACSIMILE: (206) 623-3384